

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In re : Chapter 9
: Case No. 13-53846
CITY OF DETROIT, MICHIGAN, :
Debtor. : Hon. Steven W. Rhodes
: :
-----X

***EX PARTE MOTION OF THE OFFICIAL
COMMITTEE OF RETIREES FOR AN ORDER
AUTHORIZING IT TO FILE A REPLY BRIEF IN EXCESS OF PAGE LIMIT***

The Official Committee of Retirees (the “Committee”) hereby moves the Court for the entry of an order authorizing the Committee to file the *OFFICIAL COMMITTEE OF RETIREES’ MEMORANDUM OF LAW IN SUPPORT OF CONFIRMATION OF FIFTH AMENDED PLAN FOR ADJUSTMENT OF DEBTS FILED BY THE CITY OF DETROIT, MICHIGAN* in excess of the page limitation of Rule 9014-1(e) of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the “**Local Rule 9014-1(e)**”) to the extent that the limitation is applicable. In support of this motion, the Committee states as follows:

1. Local Rule 9014-1(e) describes a 20 page limitation for certain specified motions. Local Rule 9014-1(e).
2. The Committee does not believe that the page limitation set forth in Local Rule 9014-1(e) is applicable to the Committee’s Memorandum in Support of Confirmation, but files this *Ex Parte* motion out of an abundance of caution.

3. The Committee's Reply is fifty pages. Because the Committee responds to numerous issues of fact and law raised by the objectors to the Plan, and makes the case for treatment of retirees consistent with the terms of the Plan accepted by the retirees by the requisite numbers, the Committee requires the additional pages.

4. To the extent that the Local Rule applies to the Committee's Reply, the Committee requests entry of an order expanding the applicable page limitation.

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RELIEF REQUESTED

WHEREFORE, the Committee respectfully requests that this Court (i) enter an order substantially in the form attached hereto as **Exhibit 1**, granting the relief sought herein; and (ii) grant such other and further relief to the Committee as the Court may deem proper.

Dated: August 4, 2014

New York, New York

Respectfully submitted,

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EXHIBIT 1

(Proposed Order)

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**EX PARTE ORDER AUTHORIZING THE OFFICIAL COMMITTEE
OF RETIREES TO FILE A REPLY BRIEF IN EXCESS OF PAGE LIMIT**

This matter coming before the Court on the *Ex Parte Motion of the Official Committee of Retirees to File a Reply Brief in Excess of Page Limit* (the “**Motion**”) and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Official Committee of Retirees its authorized to file *OFFICIAL*

*COMMITTEE OF RETIREES’ MEMORANDUM OF LAW IN SUPPORT OF CONFIRMATION
OF FIFTH AMENDED PLAN FOR ADJUSTMENT OF DEBTS FILED BY THE CITY OF
DETROIT, MICHIGAN* in excess of 20 pages.

CERTIFICATE OF SERVICE

The undersigned certifies that on August 4, 2014, the foregoing EX PARTE Motion of the Official Committee of Retirees for an Order Authorizing It to File a Reply Brief in Excess of Page Limit was filed and served using the Court's CM/ECF system which provides electronic notification of such filings to all counsel of record.

Dated: August 4, 2014

By: /s/ Carole Neville
Carole Neville